

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
HUNTINGTON DIVISION**

Jonathan R., minor, by Next Friend, Sarah DIXON, et al.,)	
)	
)	
)	
Plaintiffs,)	Class Action
)	3:19-cv-00710
v.)	
)	
Jim JUSTICE, in his official capacity as the Governor of West Virginia, et al.,)	
)	
)	
Defendants.)	

NOTICE OF RULE 30 DEPOSITION

PLEASE TAKE NOTICE that, Pursuant to Rule 30 of the Federal Rules of Civil Procedure, Plaintiffs Jonathan R., *et al.*, by and through counsel, shall take depositions upon oral examination of the West Virginia Department of Human Services (“DoHS”) through one or more officers, directors, agents or other representatives who shall be designated to testify on DHHR’s behalf regarding all information known or reasonably available to DHHR with respect to the subject matters identified in Exhibit A. Plaintiffs request notice at least five business days before the deposition of the name(s) and employment position(s) of the individual(s) designated to testify on the State’s behalf. Witness(es) should bring samples of any corresponding documents and/or printouts that exist and are kept in the ordinary course of business.

This deposition shall commence on June 13, 2024, or at another mutually agreed upon date, at 9:00 a.m. and shall be taken before a duly certified court reporter and notary public or other person authorized by law to administer oaths. The deposition shall be taken via Zoom or other similar virtual means. The deposition will be recorded by stenographic means.

Dated: June 4, 2024

/s/ Marcia Robinson Lowry
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Counsel for Plaintiffs

Exhibit A

- All information pertaining to Defendants' tracking and monitoring of caseloads, *i.e.*, the number and distribution of cases handled by caseworkers and/or the number of individual children's Cases assigned to each Caseworker, as those terms are defined in Plaintiffs' Thirteenth Request of Production of Documents to Defendants ("Plaintiffs' 13th Request for Production").

- All information pertaining to any data Defendants maintain in any manner or generate for any purpose concerning caseloads. Such data shall include, but not be limited to documents that Defendants produced in response to Plaintiffs' 13th Request for Production, including:

- D001937440
- D001937441
- D219810–D219819
- D222765
- D144564–D144565
- D146246
- D146248–D146249
- D210029–D210037
- D219792–D219800
- D144563
- D144566
- D146245
- D146247

- All information pertaining to how caseloads and cases are calculated.
- All information pertaining to how cases are assigned and/or distributed among caseworkers.